

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	Chapter 13
	:	
Mary Riley	:	No. 21-10071-MDC
Debtor	:	

STIPULATION OF SETTLEMENT OF MOTION FOR TURNOVER AND FOR  
SANCTIONS FOR VIOLATION OF THE AUTOMATIC STAY UNDER 11 U.S.C.  
SECTION 362

Debtor, by her attorney Daniel S. Harris and Creditor, Auto Deals Unlimited hereby agree in resolution of the Debtor's Motion for Turnover and for Sanctions as follows:

1. Debtor filed a Chapter 13 Bankruptcy case on January 11, 2021.
2. Prior to filing the Bankruptcy Debtor purchased and financed a 2008 Ford Edge from the Creditor, Auto Deals Unlimited.
3. Prior to filing the Bankruptcy Creditor, Auto Deals Unlimited repossessed the 2008 Ford Edge on December 28, 2020, and have been in possession of the vehicle to date.
4. Debtor shall amend the Chapter 13 Plan to include adequate protection payments from the Chapter 13 Trustee to Creditor, Auto Deals Unlimited in the amount of \$250.00 per month beginning February 2021 and up until Confirmation of the Chapter 13 Plan.
5. Debtor shall amend the Chapter 13 Plan to pay Creditor, Auto Deals Unlimited's secured claim in the Plan. All adequate protection payments shall be applied to the total being paid to the Creditor in the Plan.
6. Creditor, Auto Deals Unlimited will release the 2008 Ford Edge and the contents therein to the Debtor upon amending the Chapter 13 Plan.

The undersigned hereby consent to the form and entry of the within Stipulation.

/s/ Daniel S. Harris, Esq.

Daniel S. Harris, Esq.  
Attorney for Debtor  
Bankruptcy Done Right, LLC  
1845 Walnut Street, 19th Floor  
Philadelphia, PA 19103  
215-853-6383



Sommer Miller, Esq.  
Attorney for Auto Deals Unlimited  
2 Bala Plaza  
Bala Cynwyd PA 19004  
215-473-4353

IT IS hereby ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.

ENTERED ON: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE MAGDELINE D. COLEMAN  
CHIEF U.S. BANKRUPTCY JUDGE